



UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MANUCHEHR KHOSHBIN,

Defendant.

Case No. 8:25-cr-00026-FWS

I N F O R M A T I O N

[26 U.S.C. § 7203: Willful Failure
to Pay Tax]

The Acting United States Attorney charges:

[26 U.S.C. § 7203]

During the calendar year 2017, defendant MANUCHEHR KHOSHBIN had and received taxable income of \$7,163,049, on which taxable income there was owing to the United States of America an income tax of \$1,380,932. Defendant KHOSHBIN was required by law to pay such tax on or before October 15, 2018, to any person assigned the responsibility to receive payments at the IRS Service Center in Fresno, California, or to any other proper officer of the United States. Well knowing all of the foregoing, on October 14, 2018, in

1 the Central District of California and elsewhere, defendant KHOSHBIN
2 willfully failed to pay the income tax due for calendar year 2017.

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4 JOSEPH T. MCNALLY
5 Acting United States Attorney

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7 LINDSEY GREER DOTSON
8 Assistant United States Attorney
9 Chief, Criminal Division

10 ANNE C. GANNON
11 Assistant United States Attorney
12 Chief, Orange County Office

13 JENNIFER L. WAIER
14 Assistant United States Attorney
15 Deputy Chief, Orange County
16 Office